



**DEPARTMENT OF THE NAVY  
OFFICE OF THE GENERAL COUNSEL  
1000 NAVY PENTAGON  
WASHINGTON, D.C. 20350-1000**

AGC(E) 03118  
November 17, 2003

MEMORANDUM FOR DEPARTMENT OF THE NAVY INVITEES

Subj: SURFACE NAVY ASSOCIATION SIXTEENTH ANNUAL SYMPOSIUM

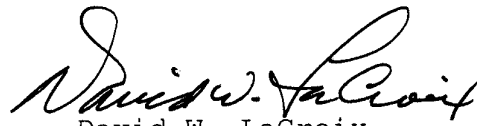
The Surface Navy Association will sponsor its Sixteenth Annual National Symposium (Symposium) at the Hyatt Regency Hotel in Arlington, Virginia on January 12-16, 2004. The Symposium consists of a number of seminars, luncheons, and associated events. Attendees will be active duty and retired military men and women, civilian Government officials, and civilians from industry, academia, and the media. Approximately 1000 individuals are expected to attend the Symposium.

The seminars, Reception and Join Up, International Navies Luncheon, Senior Enlisted Roundtable and Breakfast, and Awards Luncheon, are open to all military and civilian personnel. Accordingly, free or reduced fee attendance by Department of the Navy personnel at these events is permitted under 5 C.F.R. § 2635.203(b)(4). The Junior Officer Roundtable and Luncheon is valued at \$20 or less. Accordingly, Department of the Navy Junior Officers may accept free attendance at this luncheon pursuant to the gift exception at 5 C.F.R. § 2635.204(a).

The Department of the Navy has determined that attendance by Department of the Navy invitees at the Corporate Vice President's Breakfast, Corporate Sponsor's Flag Officer Luncheon, and Reception and Banquet, constitutes an exception under 5 C.F.R. § 2635.204(g)(2). This memorandum constitutes a finding pursuant to 5 C.F.R. § 2635.204(g)(3)(ii) of agency interest in these events which are an integral part of the Surface Navy Association Sixteenth Annual Symposium. Accordingly, Department of the Navy personnel whose duties do not substantially affect the Surface Navy Association may attend these events in their personal capacities and accept free attendance which may include a waiver of all or part of the fees and the provision of food, refreshments, and entertainment furnished to all attendees as an integral part of the events. They may not, however, accept travel expenses or lodgings personally.

Department of the Navy employees whose duties may substantially affect the Surface Navy Association should seek an

individual determination pursuant to 5 C.F.R.  
§ 2635.204(g)(3)(i) regarding these events event from their  
local ethics counselor.

A handwritten signature in black ink, reading "David W. LaCroix". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

David W. LaCroix  
Assistant General Counsel (Ethics)